REMARKS

An Office Action was mailed on February 27, 2002. Claims 1 – 27 are pending in the present application. The specification is amended to address the Examiner's objection with regard to informalities. No new matter is introduced.

OBJECTION TO THE SPECIFICATION

The specification is objected to in regard to informalities at pp. 7, 8, 13, 18, 26 and 28. Applicant amends the specification to address these informalities, and respectfully requests that the objection be withdrawn.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 1 - 27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicant's admitted prior art (AAPA) in view of U.S. Patent No. 6,246,414 to Kawasaki. Applicant respectfully traverses this rejection.

Applicant's claimed invention, as represented by independent claims 1, 8, 9, 10, 17 – 19, 26 and 27, discloses an image processing device and method that stores source image data in units of pixels in a first storage means and destination image data in units of pixels in a second storage means, and renders destination image pixels employing a rendering means that performs a stipulated pixel-unit operation to source image data repeatedly in units of polygons until a stipulated arithmetic result is obtained.

Kawasaki discloses an image processing apparatus and method for image processing based on polygons. As described, for example, at column 7, lines 34 – 37 of Kawasaki (with reference to steps S18 – S22 of Fig. 4), the method of Kawasaki includes inputting of polygon data, conversion of coordinates, dividing of polygons, calculation of

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brightness and image projection, all executed in units of polygons. At column 9, lines 39 – 49, for example, Kawasaki notes that "it is possible to divide the polygon and calculate the brightness of each of [the] apexes [of the] polygon." Accordingly, and importantly, Kawasaki teaches away from pixel processing entirely.

The Examiner suggests that Kawasaki teaches rendering data in units of polygons as required by Applicant's claimed method and missing from the AAPA. More precisely, Applicant claims a method in which stipulated pixel-unit operations are carried out on source image pixels in order to render destination image pixels in units of polygons. Kawasaki fails to teach or otherwise suggest this limitation. In fact, Kawasaki teaches away from pixel unit operations by teaching calculations relating to the apexes of triangular polygons. As a result, there is not motivation to combine Kawasaki with the AAPA in order to produce an improved means for rendering pixels. In addition, even if combined, the combination of the AAPA and Kawasaki fail to produce Applicant's claimed method.

As Kawasaki issued on June 12, 2001 after Applicant's patent application date of May 20, 1999, it is presumed that this reference is being asserted as prior art qualifying under 35 U.S.C. § 102(e). Kawasaki was filed as a U.S. patent application on November 2, 1998. A foreign priority date of a reference cannot be used under 35 U.S.C. § 119 (a) – (d) and (f) to antedate an application filing date. MPEP 2136.03. However, under 35 U.S.C. § 119 (a) – (d) and (f), a patent application filed in the United States may be entitled to the benefit of the filing date of a prior application filed in a foreign country to overcome an intervening reference. MPEP 201.13. Applicant claims the benefit of Japanese Patent Application No. 10-138043, which was filed on May 20, 1998. This priority date clearly precedes Kawasaki's filing date of November 2, 1998, thereby disqualifying Kawasaki as a 35 U.S.C. § 102(e) reference. Applicant is prepared to

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comply with the requirements of 35 U.S.C. § 119(b)(3) if so required in order to perfect his priority claim.

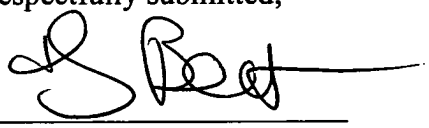
CONCLUSION

An earnest effort has been made to be fully responsive to the Examiner's objections. In view of the above amendments and remarks, it is believed that claims 1 – 27, including independent claims 1, 8, 9, 10, 17 – 19, 26 and 27 and the claims that depend therefrom, stand in condition for allowance. Passage of this case to allowance is earnestly solicited. However, if for any reason the Examiner should consider this application not to be in condition for allowance, he is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Attached is a marked up version of the changes made to the specification and claims by the current amendment. The attached pages are captioned **"Version With Markings To Show Changes Made"**.

Any fee due with this paper may be charged on Deposit Account 50-1290.

Respectfully submitted,



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IN THE SPECIFICATION

Please replace the paragraph beginning at page 7, line 19 with the following:

-- In an embodiment, the distribution medium used to distribute a program that executes processing includes a storage step wherein source image data is stored in a first storage unit of the device in units of pixels and also destination image data is stored in a second storage unit of the image processing device in units of pixels, and a generation step for generating rendering commands that cause the action of applying a stipulated pixel-unit operation to the source image data stored in the first storage unit in the storage step and rendering the data as destination image data in the second storage unit in units of polygons to be performed repeatedly until a stipulated arithmetic result is obtained.--

Please replace the paragraph beginning at page 13, line 1 with the following:

-- Rendering engine 41 of image processing chip 33 executes operations for rendering stipulated image data in image memory 43 via memory interface 42 according to rendering commands supplied from main CPU 31. Bus 45 is connected between memory interface 42 and rendering engine 41, and bus 46 is connected between memory interface 42 and image memory 43. Bus 46 has a bit width of 128 bits, for example, so that rendering can be executed at high speed in image memory 43. Rendering engine 41 has the capability to render 320×240 pixel or 640×480 pixel image data in NTSC, PAL or

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other formats, for example, in realtime at least 10 to several dozen times within 1/30 to 1/60 second.--

Please delete the text at page 18, lines 4 – 6.

Please replace the paragraph beginning at page 26, line 4 with the following:

-- The above processing is repeatedly executed until the variable n is not judged to be less than 2 (that is, until n=2) in step S81. The processing described above causes the results of multiplying by each of the elements of the 3×3 array of convolution filter coefficients to be repeatedly rendered and added to the same destination pixel data $C_{dp}[i][j]$. That is, the convolution filtering of a single subject pixel is completed.--

Please delete the text at page 28, line 4.

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